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Attorneys for Respondent

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

Jeremy Brown,

Charging Party,

and

National Association of Broadcast Employees
and Technicians - The Broadcasting and Cable
Television Workers Sector of the
Communications Workers of America, AFL-
CIO, Local 51,

Respondent.

Case Nos. 19-CB-244528
19-CB-247119

**REPLY BRIEF OF RESPONDENT TO
MOTION OF CHARGING PARTY TO
FILE REPLY BRIEF RE WITHDRAWAL
OF COMPLAINT ALLEGATION**

Mr. Solem has filed a document “Charging Party’s Reply Brief in Opposition to Respondent’s Answer Brief.”

Not surprising that Mr. Solem begins his motion by a sexist quotation from Shakespeare. Mr. Solem and his management organization have no respect for workers. Mr. Solem’s claim that the response filed by the Respondent “is patently false” is deceitful. The Board should remand this to an Administrative Law Judge so Respondent can prove the falsity of Mr. Solem’s claim.

Further the name of Mr. Solem’s organization is patently deceitful and fraudulent.

The Board should strike any pleadings filed by the organization erroneously and falsely christened “National Right to Work Legal Defense Foundation, Inc.” Rather it is a management organization designed as a front group to protect employers and to destroy unions.

The motion should be rejected. The Board should issue an order directing that the falsely named organization “National Right To Work Legal Defense Foundation, Inc.” should not use such a name in any pleadings or documents before the agency.

Dated: March 1, 2021

ORGANIZE

WEINBERG, ROGER & ROSENFELD
A Professional Corporation



By:

David A. Rosenfeld
Anne I. Yen

CERTIFICATE OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years and not a party to the within action.

On the date below, I served the following documents in the manner described below:

REPLY BRIEF OF RESPONDENT TO MOTION OF CHARGING PARTY TO FILE REPLY BRIEF RE WITHDRAWAL OF COMPLAINT ALLEGATION

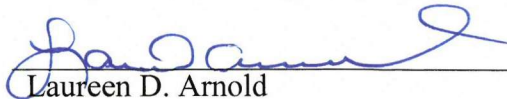
- ☒ **(BY ELECTRONIC SERVICE)** By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system from larnold@unioncounsel.net to the email addresses set forth below.

On the following parties in this action:

Mr. Aaron B. Solem
Mr. Glenn M. Taubman
c/o National Right to Work Legal
Defense Foundation, Inc.
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Springfield, VA 22160
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Attorney for Charging Party Jeremy Brown

Ms. Sarah Ingebritsen
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Attorney for the General Counsel

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 1, 2021, at Emeryville, California.


Laureen D. Arnold

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